

Exhibit J

Caroline Ortiz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

AFFIDAVIT OF
CAROLINE ORTIZ

20-CV-00415 (GBD)(SN)

CAROLINE ORTIZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 16 East 204th Street, Apt. 6B, Bronx, New York 10468.
2. I am currently 34 years old, having been born on March 29, 1988.
3. I am the daughter of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My mom was the most important person in my life. She was kindhearted, generous, and outgoing. There was nothing more I wanted in life than to spend time with my

mom. I loved going to the beach and theme parks with her. I watched her cook every chance I got so I could learn. My mom and I watched movies together and talked about life. She encouraged me to study hard in school and become more of an outgoing person. My mom gave me life advice. I admired her because she did not let negativity affect her life. Not a day passed where my mom and I did not text or call each other. I loved seeing my mom happy and laughing.

6. I was at school on the day of the September 11th terrorist attacks. I got a message from my mom that something had happened to the World Trade Center. When I returned home, my mom left me with a babysitter. It was a very confusing day for me. I found out later that my mom was helping to clean up the debris and the damage caused by the aftermath of the attacks. She told me that she could feel the utter sadness in the area.

7. Several years after the attack, my mom's health started to decline. She became really weak and could hardly eat. My mom was bedridden for a long time. I remember hearing her moaning and crying in pain at night. The pain in her stomach was excruciating. A lot of my mom's hair fell out whenever I brushed her hair. I later found out that the was cancer spreading throughout her body.

8. I tried my best to stay positive and strong for my mom while she was fighting her cancer. I told her jokes to lift her spirits. It saddened me to see my mom lose her balance and strength. She could hardly open her eyes. She needed a constant caretaker because she could not use the bathroom on her own. I felt helpless not being able to help my mom get better.

9. My mom was diagnosed with stage IV cancer in February 2013. I was my mother's health care proxy, so I was able to speak with her doctor directly after we found out about her cancer diagnosis. The doctor told me that it was too dangerous to operate on her because the cancer had spread to her vital organs. About a month later, my mom passed away.

10. I felt heartbroken and scared after my mom passed away. I was angry at the people who attacked the World Trade Center because I believed they were responsible for my mom's death. I became depressed and experienced anxiety. I will never be able to forget how my mom suffered from her cancer. I felt guilty that I was unable to help save her.

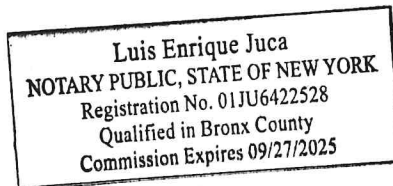
11. My depression got worse when my daughter was born. It saddened me to think about how my mom never got a chance to meet or hold my daughter. I only hope that I am half as good a mother to my daughter as my mom was to me. I have been treated for my depression several times, but I do not think I will ever be able to overcome my heartache. My mom was my best friend. I feel very alone in this world without her.


CAROLINE ORTIZ

Sworn to before me this
17 day of May, 2022


Notary Public

Luis Enrique Juca
NYS. Notary Public.
County: Bronx
Ex. 9/27/25



Ernesto Ortiz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

Plaintiffs,

AFFIDAVIT OF
ERNESTO ORTIZ

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

ERNESTO ORTIZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 124 Maujer Street, Apt. 4C, Brooklyn, New York 11206.
2. I am currently 40 years old, having been born on May 26, 1982.
3. I am the son of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My mother was my go-to for everything. Before she got sick, we went to the park, barbecues, and family events. She always gave me advice when I needed it. She

encouraged me to go after my goals and never give up on myself. She gave me advice about women and told me, "Always think about your mother." We joked around and pulled pranks on each other, scaring each other just for fun. She was very loving and caring towards her kids.

6. My parents worked for the NYC Department of Health, and my mother mostly did pest control for the Health Department. When they called them to the World Trade Center for the clean-up, both she and my dad were exposed to the dust. When they came home from Ground Zero, their clothes and headgear were covered in white dust. Once, my mother got a bad asthma attack while working in the debris, and the EMTs had to come. My parents were pretty much working in dust and debris all day. Before 9/11, my mom was superhuman—she barely got sick. After the 9/11 cleanup, she started to get sick more frequently.

7. My mother started to feel abdominal pains in late 2012. She had trouble breathing and even once told me that she felt her heart stop while she was sleeping. She was terrified. In late January or early February 2013, she was diagnosed with stage IV colon cancer. I don't think she was going through any treatments because, for a long time, she didn't know she had cancer.

8. Before my mom got sick, I had quit my job, so I was living at home with my parents. At the time, I was going to driving school for my commercial driver's license. It was extremely hard to watch her suffer at home. I watched her struggle with everything.

9. Since her passing, I've become much more anxious and depressed. There's a feeling of loneliness, sadness, and emptiness when you lose someone so close to you. You miss the care and the love that a mother gives you when you need it. I wish I could hear her voice to calm me down on the days when I'm stressed out or not feeling right.

10. My mother always pushed me to succeed. She motivated me to go back to school for my commercial driver's license and encouraged me to continue. I felt like quitting at times,

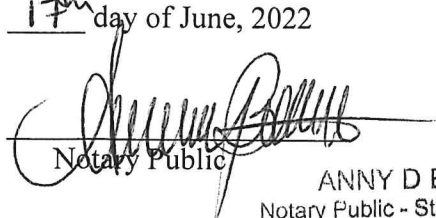
but she told me I had to push forward even when times were hard. When I got my license, she had already passed away. My driving teacher told me he wished my mother was there because he knew she was my greatest supporter. For her not to see me pass my Class B commercial driver's license exam made me sad because she should have been there. Even after my mother died, I pushed myself to get my class A license because I knew she would have wanted me to have the highest ranking to drive trucks. I did it in her memory.

11. I miss my mother a lot. Not a day goes by that I don't think of her. I always cry when I visit her in the cemetery, knowing that I'll never hug her again and never get to feel the embrace of a mother's love. Not seeing her physically around me makes me feel like I'm going crazy. I wish I could speak to her, learn more from her, and hear her advice again. I wanted to give her a better life and help her live more comfortably. I wish I could tell her now how much she's loved. It hurts knowing that there's no one like her and that there will never be anyone like her again.


 ERNESTO ORTIZ

Sworn to before me this
17th day of June, 2022

6/17/2022


 Notary Public

ANNY D BELTRE
 Notary Public - State of New York
 No. 01BE6401603
 Qualified in Kings County
 My Commission Expires Dec. 16, 2023

Manuel Ortiz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOHNN BASCI, et al,

**AFFIDAVIT OF
MANUEL ORTIZ**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

MANUEL ORTIZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 54 Sunnyside Avenue, Apt. 2R, Brooklyn, New York 11207.
2. I am currently 38 years old, having been born on February 10, 1984.
3. I am the son of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My mom was my mentor and best friend. She had a warm and fun-loving personality. I appreciated my mom for working long hours so that my siblings and I could have a

happy and comfortable childhood. Since I was a kid, I sought my mom's advice and approval because she meant the world to me. Whenever I finished work or school, I looked forward to seeing my mom at home. I promised myself that I would give my children the same amount of love and affection that my mom gave me when I was a kid.

6. Everyone in my family loved spending time with my mom, especially my children. My mom was the glue that kept our family together. She was an incredible cook and had a great sense of humor. I looked forward to celebrating the holidays with my mom every year because she always made my favorite dishes.

7. I was at work on 9/11. It was an emotional day for our entire family. After the attack, I found out that my mom was cleaning debris at Ground Zero. I remember my mom returning home from work, coughing and feeling congested.

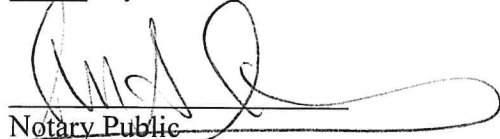
8. Several years after the attack, my mom started getting sick. She stopped her morning routine of waking up before sunrise. I began noticing my mom losing her energy. I got really worried when I saw a strange bump on my mom's stomach. At the time, I thought it was my mom's high blood pressure that was making her feel unwell. Later, I found out that the bump was a tumor. I was in complete disbelief when I learned that my mom had cancer. I was the last person in my family to find out about my mom's diagnosis.

9. My life changed for the worse after my mom passed away. I struggled with depression and anger. I only got to spend about a week with my mom before she died, which made me feel even more devastated. I blamed myself for not being more attentive to my mom's health and wellbeing. I burst into tears whenever I saw images of 9/11 because it reminded me of how much my mom suffered toward the end of her life. Sometimes, I start crying when I see my kids and think about how my mom will never know what they look like as adults.

10. It upsets me that my mom never received proper safety gear or training before working at Ground Zero. I believe my mom's cancer could have been prevented if she had been given something as simple as a respirator mask. For the rest of my life, I will be obsessed with thoughts of how my mom's life could have been saved. My mom was the most precious person in my life. The love she showed me can never be replaced.


MANUEL ORTIZ

Sworn to before me this
30 day of June, 2022


Notary Public

LORI S. LANDIS
Notary Public, State of New York
No. 30-4730420
Qualified in Nassau County
Commission Expires 5/3/2026

Mariano Ortiz Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOHNN BASCI, et al,

**AFFIDAVIT OF
MARIANO ORTIZ, JR.**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF KINGS)

MARIANO ORTIZ, JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 124 Maujer Street, Apt. 4C, Brooklyn, New York 11206.
2. I am currently 41 years old, having been born on November 9, 1980.
3. I am the son of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My mom was my best friend and confidante. She had a great personality and was a very positive person. I enjoyed spending time with my mom more than any other family

member. She was a great listener. I always asked my mom for her opinions and talked to her about my feelings and emotions. My mom gave me encouragement. She helped me get through many obstacles in my life. I looked forward to family gatherings at my mom's house because she was an incredible cook. I brought my children to see my mom as often as possible because my mom loved spending time with them.


6. I was at home with my daughter at the time of the September 11th, 2001 terrorist attacks. I was in complete shock when I saw the World Trade Center collapse to the ground. Soon after the attack, I found out that my mom was at Ground Zero helping to clean the debris.

7. Several years after 9/11, I found out that my mom was feeling sick. She took time off from work and rested for a few days. She was playing computer games in bed when I visited her. It was strange seeing my mom resigned to her bed because she was a very active person, always busy cooking or cleaning the house. My mom's health continued to get worse over time. I got very worried when I saw how weak and frail she had gotten the next time I saw her.

8. By the time our family found out that my mom had been diagnosed with cancer, it was already too late to start chemotherapy. The doctor told us that my mom's cancer had spread to most of her body and vital organs. I was at the hospital every day after my mom's diagnosis. I lost my job as a result, but that was the last thing I cared about at the time. It was heartbreaking to see my mom dying from cancer. I was in complete disbelief when she suddenly passed away.

9. I became very depressed after my mom died. I isolated myself from my friends and family. I felt like I had no one to talk to anymore. I repressed my emotions and drank alcohol to help cope with my mom's death. I had a very unhealthy and self-destructive lifestyle. I was in physical pain because I missed my mom so much. Whenever my kids have a birthday, my

mom's absence feels that much more noticeable. There is not a day that goes by where I don't think about my mom. I wish I had spent more time with her.


MARIANO ORTIZ, JR.

Sworn to before me this
16th day of May, 2022


Notary Public

ANNY D BELTRE
Notary Public - State of New York
No. 01BE6401603
Qualified in Kings County
My Commission Expires Dec. 16, 2023

Mariano Ortiz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOHNN BASCI, et al,

**AFFIDAVIT OF
MARIANO ORTIZ**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF KINGS)

MARIANO ORTIZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 124 Maujer Street, Apt. 4C, Brooklyn, New York 11206.
2. I am currently 67 years old, having been born on April 30, 1955.
3. I am the husband of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Milagros passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Milagros was the love of my life. She was my best friend and soulmate. She and I had known each other since we were kids. We attended the same schools growing up and did

everything together. We even worked together at the Department of Health. I considered myself very lucky to have Milagros as my wife because she was a very positive influence on me. I will always be grateful to her for making me a better person.

6. On the day of the September 11th, 2001 terrorist attacks, Milagros and I were working in Brooklyn. A person passed by and shouted that the World Trade Center had been hit by a plane, so I called Milagros to make sure she was safe. Shortly afterwards, we returned to our office where we witnessed the second World Trade Center tower fall to the ground. Milagros and many of my colleagues started crying. It was a horrific and emotional moment for everyone.

7. About a week after the attacks, my boss asked for volunteers to help clear the debris from Ground Zero. Milagros and I signed up right away. We went to Ground Zero with the employees who we were supervising, eager to get started. Witnessing the destruction up close and working to clear the debris was emotionally and physically taxing. It was not long before we started cleaning the nearby stores and restaurants. For a week, Milagros and I were busy cleaning debris, removing rotten food from restaurants, and sweeping dust. Milagros and I hardly had time to think about whether the air we were breathing or the food we were eating contained any harmful toxins.

8. Milagros got sick several years after 9/11. She was getting noticeably weaker each day. Her hair was falling out. She had excruciating pain in her stomach and back. She was constipated and vomiting a lot. She lost a lot of weight. Milagros stayed in bed most of the time and hardly ever ate.

9. Milagros and I lost our jobs in 2011 due to budget cuts. We struggled financially afterwards. In order to get financial support from the state, I had to enroll in a course that would help me find another job. It was extremely difficult for me to focus on the course because I was

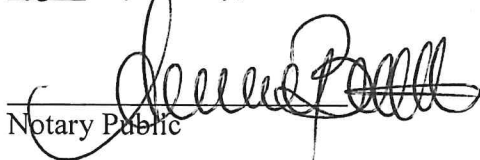
constantly thinking about Milagros' health and wellbeing. I would cry whenever I was apart from her.

10. Milagros was the most resilient person I had ever met. Even though it was clear to me that she was in a lot of pain, Milagros continued to tell me that she was going to be okay and that she did not need to see a doctor. Her condition was not improving, so I convinced her to go to the hospital. When the doctor examined Milagros, her pulse was so low that she was rushed to the emergency room. She was diagnosed with cancer that day. The doctor told us that it was too late to start chemotherapy because Milagros' cancer had spread to her vital organs. It was the most heartbreaking moment of my life.

11. My life feels completely empty without Milagros. I miss hearing her voice and seeing her smile in the morning. I feel disconnected from my friends and family members. I feel anxious and depressed all of the time. Even on special occasions like birthdays and holidays, I feel empty inside because I am reminded of all of the things that Milagros did for me and our children to make us feel happy and loved. I miss her so much.


MARIANO ORTIZ

Sworn to before me this
16th day of May, 2022


Notary Public

ANNY D BELTRE
Notary Public - State of New York
No. 01BE6401603
Qualified in Kings County
My Commission Expires Dec. 16, 2023

Miguel Ortiz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOHNN BASCI, et al,

AFFIDAVIT OF
MIGUEL ORTIZ

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

MIGUEL ORTIZ, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 124 Maujer Street, Apt. 4C, Brooklyn, New York 11206.
2. I am currently 38 years old, having been born on February 10, 1984.
3. I am the son of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My mom was my best friend and confidante. She was the most dependable person I knew. I told my mom about everything that was going on in my life and always sought

her advice and approval. I was the momma's boy of the family. My mom enjoyed being outdoors, so she and I would go on long walks to the park. I loved spending time with her.

6. After the World Trade Center was attacked on September 11th, 2001, I found out that my mom was working near Ground Zero. I was extremely worried that my mom would see the remains of the fatally injured victims. During the week following the attacks, my mom helped clean the businesses near Ground Zero. She got rid of the rotten food from the restaurants and removed debris. My mom later told me that she was devastated by what she saw and experienced that day. She cried every day after work.

7. Around November 2012, I noticed a change in my mom. She looked really weak and frail. My mom told me that she was doing fine, so I did not think too much of it at the time. About a month later, I visited my mom and was shocked to see her bedridden. My mom could barely get up from bed. She had difficulty breathing and using the bathroom. I could tell that my mom was in a lot of physical pain and discomfort. I realized that my mom had tried to hide her sickness from me. She was trying to protect me.

8. I was terrified when I found out that my mom had been diagnosed with cancer. All I could think about was what I could do to help save her life. I was willing to put a second mortgage on my house and use my life's savings to help pay for her chemotherapy, but my mom's doctor told us that it was too late. Her cancer had already spread to her vital organs. I was in complete disbelief. I could not fathom the notion that my mom had only a month's time to live.

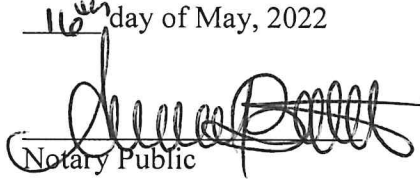
9. After my mom passed away, my life changed for the worse. I was depressed and alone. I felt uncomfortable sharing my emotions with anyone. I became quiet and reserved. I stopped spending time with my loved ones because I did not want to get attached to anyone in

case I lost them in the future. My relationship with my wife got worse each day. We eventually got divorced. I felt like my life had become a nightmare.

10. It saddens me to know that my mom never got a chance to meet my son, whom she had named. I get emotional whenever I hear songs that my mom once loved. Whenever my children achieve a milestone in their lives, I always think about how happy it would have made my mom. I miss my mom all of the time.


MIGUEL ORTIZ

Sworn to before me this
16th day of May, 2022


Notary Public

ANNY D. BELTRE
Notary Public - State of New York
No. 01BE6401603
Qualified in Kings County
My Commission Expires Dec. 16, 2023

Rosie Perez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

Plaintiffs,

**AFFIDAVIT OF
ROSIE PEREZ**

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

ROSIE PEREZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 844 Bryant Avenue, 2nd Floor, Bronx, New York 10474.
2. I am currently 42 years old, having been born on June 28, 1979.
3. I am the daughter of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My mom was the most influential person in my life. She was fun-loving, selfless, and kindhearted. We both enjoyed singing and dancing together. My mom loved me

unconditionally. She supported me when I got pregnant at a young age. My mom taught me how to look after my child with care and attention. I learned to be creative and crafty from observing my mom. It made me very happy to see my mom playing with my kids. She loved spending time with her grandchildren. I felt fortunate knowing that I could always count on my mom for support.

6. My mom prioritized our family members' health and happiness before her own. She loved getting the entire family together for holidays, especially Thanksgiving. My mom loved to cook for our family. My favorite childhood memories are spending time with my family over a home-cooked meal prepared by my mom.

7. My mom was at work on 9/11. She later told me that she had to clean debris at Ground Zero. She found the work to be physically and emotionally draining. My mom was scared of all the dust in the buildings where she worked. She told me that she would never forget the images of destruction she witnessed while working at Ground Zero.

8. When my sister told me that my mom was sick, I immediately called my mom. My mom had kept her cancer a secret from me because she did not want me to worry about her. I was in denial when my mom told me she had cancer. I went to see her right away. I was shocked when I saw my mom. I had never seen her look so weak and frail. She had lost a lot of weight. She was throwing up all the food she was eating. She could not even drink a smoothie without vomiting.

9. After I found out about my mom's cancer diagnosis, I helped take care of her. I washed my mom's clothes. I fed her. I helped bathe her. I did my best to cheer my mom up. I played her favorite songs for her. I brought my kids to see my mom. It was emotionally

traumatizing for me to witness my mom suffer from the pain and discomfort caused by her cancer.

10. When my mom's doctor told me that her cancer was terminal, I broke down in tears. It was one of the worst moments of my life. I could not say my final goodbye to my mom before she passed away. I had to periodically return to the homeless shelter where I had been living so that I could continue to stay there. I was at the shelter when my mom passed away. I could not believe that my mom was gone from my life when I returned to the hospital the next morning.

11. I became very depressed after my mom passed away. I was even more devastated when I saw how much it hurt my children to lose my mom. My son still cries whenever he misses my mom. There is not a day that goes by when I do not think about my mom. I do not know how I can move on with my life. I still remember the images of my mom suffering from her cancer. She was one of the only people I could talk to and count on when I was struggling in my life. I feel her loss weighing on me every day.

 6/15/22
ROSIE PEREZ

Sworn to before me this
15 day of June, 2022


Notary Public

MANDY L LOPEZ
NOTARY PUBLIC-STATE OF NEW YORK
No. 01LO6416821
Qualified in Bronx County
My Commission Expires 04-26-2025

6/15/2022

Charlotte Solano

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

Plaintiffs,

**AFFIDAVIT OF
CHARLOTTE SOLANO**

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

CHARLOTTE SOLANO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1166 Elton Street, Apartment 3H, Brooklyn, New York 11239.
2. I am currently 45 years old, having been born on December 30, 1976.
3. I am the daughter of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My mother and I were very close. We often traveled to Puerto Rico and attended family events together. She would go to my daughter's dance recitals every year. We always had family events, birthdays, and holidays at her house.

6. My mother worked for the NYC Department of Health when 9/11 occurred. I knew she was working near the World Trade Center after the 9/11 attacks, but I didn't know the extent of how much she was doing at Ground Zero. She was part of the clean-up crew. She worked there for about a week. I never asked her about it. Anything I needed to know, I saw on television.

7. My dad first told me about my mom's illness in January 2013. I still try to block everything out of my mind from that time. Before her cancer, my mom was very active. She was always with her children, going to the park with her grandkids or taking them to the zoo. She was very involved in her kids' and grandkids' lives. After being diagnosed, she was always very sleepy and often complained about the pain. I remember her skin was yellow. I don't remember much about her treatment. I feel like it all happened so quickly.

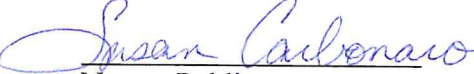
8. As soon as my mother was admitted to the hospital, I took a leave of absence from work. I explained to them that I wouldn't return until the doctors told us whether she would make it. I stayed with my mother in the hospital because I wanted to support her as much as possible.

9. My mother's illness frightened me in a way. I became fearful that if something happens to me or if I start to feel pain, it means I have cancer as she did. Sometimes I cry for no reason. Memories of her will come to my mind, making me sad. When I was at work, I used to call her in my spare time and talk to her. Now I don't have that. I don't have someone to talk to day to day. Of course, I have my dad and siblings, but it's not the same.

10. I would say that my mom was an amazing woman. She was a great mother, friend, and grandmother. She loved her grandkids so much, and they adored her. She picked them up every weekend just to be with them. Her favorite holiday was Thanksgiving. We would all gather at her house every year for it. She always wanted to be a part of her kids' lives, whether it was at school or home. She was just a great mother and grandmother. Our entire family misses her.


CHARLOTTE SOLANO

Sworn to before me this
16 day of June, 2022


Notary Public

SUSAN CARBONARO
Notary Public, State of New York
No. 01CA6241992
Qualified in Nassau County
Commission Expires May 31, 2023

Kathleen Boyian

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
KATHLEEN BOYIAN**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

KATHLEEN BOYIAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 40 West 14th Road, Broad Channel, New York 11693.

2. I am currently 61 years old, having been born on November 16, 1960.

3. I am the sister of Daniel O'Sullivan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from pancreatic cancer on February 25, 2017, at the age of 58. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I saw my brother almost every day. We went on vacations together and traveled upstate together. We took care of my parents together. We had the same friends, and he was very involved in my daily activities and life.

6. Daniel worked as a carpenter for the City of New York. He responded to the World Trade Center on 9/11 with other City employees to assist with the rescue and recovery efforts. He was working at Ground Zero for at least five or six months. He saw many disturbing things. He told me that there were people flattened by the fallen towers. He broke down when he talked about finding bodies and body parts underneath the concrete. Daniel would tell me about the frustration of digging and not finding anything at all. He kept a lot of it to himself. It was a painful and emotional time for everyone.

7. Soon after 9/11, Daniel started to have some breathing and pulmonary issues. He was in the World Trade Center Health Program and was getting checked out every year. His legs were terrible. I saw Daniel a few days before he was diagnosed with pancreatic cancer in January 2017. I noticed that his eyes were yellow, but I didn't think anything of it. Daniel was diagnosed with pancreatic cancer at South Nassau Hospital and was immediately transferred to Weill Cornell Hospital. I drove down from upstate right away to see him. When he was diagnosed, his cancer was already in the advanced stages. It was only 28 days from the day he was diagnosed until he died.

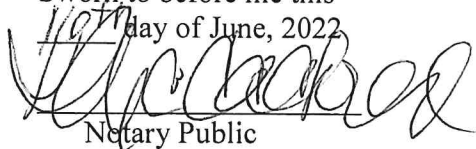
8. It was all a blur. Daniel underwent a really heavy dose of chemotherapy, but it didn't work. He had terrible symptoms—diarrhea, nosebleeds, blood clots in his legs, vomiting, discomfort, yellow eyes, and abdominal pain. He once fell off the bed and broke a tooth. It was extremely difficult seeing him deteriorate.

9. I was retired when Daniel got sick, so I stayed with him at the hospital and cared for him when he came home. My brother had a disability pension from the city and retired in the years after 9/11. The city covered most of his medical costs, and my sister and I helped with any extra expenses.

10. It broke my heart to see Daniel so sick and know that I couldn't help him. When the doctors said there was nothing further they could do for him, and we brought him home from the hospital, Daniel started crying. That was horrendous to watch. We barely had any time to digest the news. When he was diagnosed, we were hoping for a good outcome. But that wasn't possible. The hospital ultimately sent him home to die. He was only 58 years old when he passed away.

11. My brother was a funny, loving-life kind of guy. He was easygoing and loved his neighbors and his family. He went out of his way on Saint Patrick's Day to make corned beef for the whole neighborhood. He always had candy in a dish by the door for the neighborhood kids. It was heartbreaking to see his grandkids not have their grandfather and my niece have no father. Holidays aren't the same without him. Losing him was a loss for his family, daughter, and community. His life was cut short way too soon. His illness was such a horrible thing and never should have happened.


KATHLEEN BOYIAN

Sworn to before me this
16th day of June, 2022

Notary Public

KRYSTLE MARIE MCCACHREN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MC6236097
Qualified in Queens County
My Commission Expires February 22, 2016 23

Patricia O'Sullivan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
PATRICIA O’SULLIVAN

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

PATRICIA O’SULLIVAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 24 West 15th Road, Broad Channel, New York 11593.

2. I am currently 59 years old, having been born on November 5, 1962.

3. I am the sister of Daniel O’Sullivan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from pancreatic cancer on February 25, 2017. He was only 58 years old. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Daniel and I were best friends. We had a close relationship. We would go fishing, do grocery shopping together, go out to baseball games and football games, and cook together. We were big fans of the Giants and the Mets. Daniel loved to cook, so we often hosted barbecues together. Daniel’s specialty was corned beef and cabbage, and he would host the

whole neighborhood at his house for a taste of Ireland. I was very involved in his life before and during his illness.

6. Daniel worked for the NYC Department of Transportation. Shortly after 9/11, he went down to Ground Zero to help dig through rubble and clean up the debris. He described the scene to me, saying that it smelled terrible and that it was an awful experience. He was down there for six months if not more, working on the pile every day. He developed PTSD due to the experience. He became distant and somewhat withdrawn after having witnessed all those bodies and body parts. Daniel was always an outgoing guy, but after 9/11, he didn't go out as much. He didn't want to go shopping or leave the house. He had terrible nightmares. He didn't really talk about it that much. He stopped socializing the way that he used to.

7. At the time Daniel became ill, I was living at his house because my house was under construction. One morning, Daniel woke up screaming from back pain. I called an ambulance, and we rushed him to South Shore Hospital. They did a PET scan, and Daniel gave a urine sample. His urine came out a shade of burgundy. The technician said, "Mr. O'Sullivan, you have pancreatic cancer." I was dazed and shocked. Daniel was immediately admitted to the hospital, and I called my niece and sister to break the news.

8. Daniel was soon transferred to a cancer hospital. By this time, the cancer had metastasized to his lungs and liver. They started giving him chemotherapy intravenously, but it wasn't working. I went to the hospital every day to visit him, knowing he didn't have a lot of time left. My sister Kathleen, Daniel's daughter Teri, and I all took care of him. When we brought him home, everyone kept a vigil around him. He lived only a day and a half after we brought him home from the hospital and died only 28 days after he was diagnosed with pancreatic cancer.

9. It was devastating to lose Daniel, and it's still very hard to talk about. All I can say is I lost my best friend.


PATRICIA O'SULLIVAN

Sworn to before me this
29th day of May, 2022


Notary Public

KRYSTLE MARIE MCCACHREN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MC6236097
Qualified In Queens County

My Commission Expires February 22, 2023